

MAR 14 1991

Mr. Daniel Waltz
NGB/DEVR
Stop 18
Andrews Air Force Base
Maryland 20331

RE: Comments on the Site Inspection Report for Stewart Air
National Guard Base, 1989

Dear Mr. Waltz:

A preliminary screen of sites on the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) indicates that the Stewart Air National Guard Base (SANGB) site (NY3572824255) is a candidate for further technical screening, in order to determine whether the site is appropriate for the National Priorities List (NPL).

The Site Inspection Report (Volumes I and II) (1989) for SANGB could not be scored with the PA Scoring Method due to an absence of information. The PA Scoring Method is used to evaluate the potential impact of a site on both humans and the environment. It requires less information than the full application of the Hazard Ranking System (HRS). If after additional information is obtained, the site scores > 28.5 with the PA Scoring Method, then the site will be considered for HRS scoring and development of an NPL package. Enclosed is a copy of 'Guidance for Conducting Preliminary Assessments with the Revised Hazard Ranking System', as well as a copy of a previous Site Inspection Report.

Attachment I provides an overview of certain issues which need to be addressed in the Site Investigation Report or a Supplemental Report. Attachment II is the actual PA Score Sheets. The asterisks on the scoresheet indicate where data is apparently missing for this site. The package of information already received on the Pa Scoring Method and Site Inspection Report format should be used in association with Attachments I and II to develop an appropriate scope of information that will allow scoring with the PA Method.

If you have any questions, please call me at 212-264-0221.

Sincerely,

Walter H. Schoepf
Soil Ecologist

bcc: D. Santella, ERRD-PTSS
B. Conetta, ERRD-PTSS
R. Smith, NYSDEC, Region III

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Attachment I

The "Site Inspection Report" dated October 2, 1990 provides a detailed review of the minimum requirements of information necessary for a SI. The report is divided into the following sections:

- o Site Information
- o Waste Source Information
- o Sampling Results/Existing Analytical Data/Site Inspection Results
- o Hazard Assessment

Certain data gaps appear on the PA Scoresheets:

Page 1- provide enough site biography information to complete the site description categories.

Page 2- provide enough information to fill in the general information blank spaces. Be sure to determine the available information already within the existent Site Investigation Report.

Page 2(b), Page 3- Provide enough information on the maps to meet the specifications in the instructions.

Page 4, 5- Be sure that all the contaminant sources are listed for the site. The Federal Register defines methods for dealing with the removal action (page 51567) at SANGB. EPA will evaluate a site based on current conditions provided that response actions actually have removed wastes from the site for proper disposal or destruction in a facility permitted under the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA) or by the Nuclear Regulatory Commission.

Groundwater Pathway

Elements are missing from the Pathway Characteristics section. In addition, provide enough information to be able to differentiate between suspected release and no suspected release. In many cases, a significant amount of information is not available on targets. Be sure that all data has appropriate documentation.

Surface Water Pathway

Elements are also missing for the Pathway Characteristics section. In addition, provide enough information to be able to differentiate between suspected release and no suspected release. In many cases, a significant amount of information is not available for targets, such as drinking water, human food chain,

and environmental threat.

Soil Exposure Pathway

Elements are also missing for the Pathway Characteristics section. All the information is missing for the Resident Population Threat Targets.

Air Pathway

An element is missing in the Pathway Characteristics section. In addition, provide enough information to be able to differentiate between suspected release or no suspected release. In all cases, provide information on the air targets.